

SANTA MONICA MOUNTAINS CONSERVANCY

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Planning and Land Use Management Committee
City of Los Angeles
200 N. Spring Street
Los Angeles, California 90012

**Mountaingate Development Project
Vesting Tentative Tract Map No. 53072-2A
CF 06-1058**

Hon. Chairperson Reyes and Members:

The subject 29-home project is partially located in the Santa Monica Mountains National Recreation Area (SMMNRA). The project area allows for exceptionally easy public access to the SMMNRA via the 405 Freeway and Mountaingate Drive. Access to dozens of miles of trails and the largest municipal wilderness in the country are located at the end of Mountaingate Drive. A project of this magnitude must maintain and in some cases enhance an existing functional trail system.

The Santa Monica Mountains Conservancy's appeal of the subject project to the City Council focuses on its inadequate provision for the Canyon Back Trail and total lack of acknowledgement of the Mount Saint Mary's Trail. In addition there is no permanent protection for over 300 acres of natural land.

The Conservancy's objections to the project as approved by the Planning Commission lie on the need to provide an adequate Canyon Back Trail, a non-topographically demanding connection between the Mount Saint Mary's Trail and the Canyon Back Trail, and the requirement of a conservation easement over the open space in favor of the Mountains Recreation and Conservation Authority. These three requests require no reduction in the number, size or location of any proposed homes. These three requests are reasonable, based on clearly stated public need, and easily implemented by the project applicant. Absent the requirement of these three conditions as described below, the Conservancy urges the City Council to grant its, and many other entities, appeal of the Planning Commission's approval which would deny the project going forward.

The Mountains Recreation and Conservation Authority (MRCA) hired an engineer to design trail alignments that fulfilled the above stated public trail needs. Those alignments

are shown on the attached maps. A group of project proponents hired a geologist to address the physical feasibility of these MRCA recommended trail alignments. The MRCA has also retained a geologist. There appears to be no credible doubt about the geologic stability of the MRCA recommended Canyon Back Trail. The MRCA alignment provides a trail entirely outside of the development footprint, provides the full width necessary for all forms of multiple use, provides a complete natural experience, and avoids the need for any interface with gates or private entry ways. Only this suggested trail can provide the functional and amenity value of the existing Canyon Back Trail that the proposed project will grade down many tens of feet.

The Mount Saint Mary's Trail alignment continues to be analyzed by the MRCA and project proponents. The proponents are suggesting an alignment that descends from the east ridge of Bundy Canyon to the canyon bottom and back up to the west ridge using a proposed concrete switchback debris basin access road.

The bottom line is that until adequate provision is made for a connection of the Mount Saint Mary's Trail to the Canyon Back Trail, the proposed project should not be approved. If a Supplemental Environmental Impact Report (SEIR) is necessary to analyze the impacts of various trail alignments, construction methods, and widths then the City should stop short of requiring nothing less. The Conservancy commits to working with all parties involved to guarantee these trail objectives without the need for an SEIR. In all cases, the design, construction, and maintenance of the trail must be fully funded by the project applicant. An option to consider is to transfer broad easements to the MRCA and employ that agency to design, construct, and maintain the subject trail.

Please address any questions and future correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson